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 14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
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17 ELIZABETH FOWLER,	)	Case No. C 08-03463 WHA
18 v.	)	<b>JOINT STIPULATION AND</b>
19 )	)	<del>PROPOSED</del> ORDER SHORTENING
20 AETNA LIFE INSURANCE COMPANY;	)	TIME FOR PLAINTIFF'S MOTION
THE PARSONS BRINCKERHOFF	)	TO COMPEL PERSONNEL FILE
21 GROUP ADM SHORT TERM	)	DOCUMENTS
DISABILITY PLAN; THE PARSONS	)	Date: September 10, 2009
22 BRINCKERHOFF GROUP ADM LONG	)	Time: 8:00 a.m.
TERM DISABILITY PLAN, et al.,	)	Courtroom: 9, 19 <sup>th</sup> Floor
23 Defendants.	)	Judge: Hon. William H. Alsup

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## **STIPULATION**

Plaintiff Elizabeth Fowler and Defendants Aetna Life Insurance Company, The Parsons Brinckerhoff Group ADM Short Term Disability Plan, The Parsons Brinckerhoff Group ADM Long Term Disability Plan, by and through their respective counsel of record, hereby stipulate and agree as follows:

1. Plaintiff intends to file a Motion to Compel the production of certain documents from the personnel file of Aetna claims handler Andres Matos on September 1, 2009.

Defendants intend to oppose Plaintiff's Motion. The Motion and supporting papers shall be filed under seal pursuant to Local Rule 79-5, per the Court's August 21, 2009 Order.

2. The deposition of Mr. Matos is currently set for September 17, 2009.

3. In light of the September 17, 2009 date for Mr. Matos' deposition, and the discovery cutoff deadline of September 30, 2009, IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys of record that the notice and briefing deadlines for Plaintiff's Motion to Compel be shortened to the following deadlines:

- September 1, 2009 – Plaintiff’s Notice of Motion and Motion to Compel and supporting papers to be filed under seal pursuant to Local Rule 79-5;
- September 8, 2009 – Defendants’ Opposition and supporting papers in opposition to Motion to Compel to be filed under seal pursuant to Local Rule 79-5.

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1           The hearing for Plaintiff's Motion to Compel and Defendants' Motion for Protective  
2 Order shall be on September 10, 2009 at 8:00 a.m. before the Honorable William H. Alsup.

3 DATED: August 31, 2009

PILLSBURY & LEVINSON, LLP  
BRIAN H. KIM

8 DATED: August 31, 2009

GORDON & REES LLP  
RONALD K. ALBERTS  
TAD A. DEVLIN

11 By: /s/ Brian H. Kim

BRIAN H. KIM  
Attorneys for Plaintiff Elizabeth Fowler

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RONALD K. ALBERTS  
TAD A. DEVLIN

13 Attorneys for Defendants Aetna Life Insurance  
14 Company, the Parsons Brinckerhoff Group ADM Short  
15 Term Disability Plan, and the Parsons Brinckerhoff  
16 Group ADM Long Term Disability Plan

17 **PROPOSED ORDER**

18 Upon consideration of the foregoing request, and with good cause appearing therefore,  
19 IT IS HEREBY ORDERED that the notice and briefing deadlines for Plaintiff's motion  
20 for leave to file her Second Amended Complaint be shortened to the following deadlines:

21     • September 1, 2009 – Plaintiff's Notice of Motion and Motion to Compel and  
22       supporting papers to be filed under seal pursuant to Local Rule 79-5;  
23     • September 8, 2009 – Defendants' Opposition and supporting papers to Motion to  
24       Compel to be filed under seal pursuant to Local Rule 79-5; and  
25       September 14, 2009 at 2 p.m.  
26       The hearing for Plaintiff's Motion to Compel shall be on ~~September 10, 2009 at 8:00~~  
27       a.m. before the Honorable William H. Alsup.

28     PURSUANT TO STIPULATION, IT IS SO ORDERED.  
29  
30 Dated: August 31, 2009

Hon. William H. Alsup  
United States District Court

